

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

VICKIE ADAMS f/k/a Vickie Douglas,

Plaintiff,

v.

FIRST DATA RESOURCES, LLC, and  
FIRST DATA CORPORATION,

Defendants.

CASE NO.: 8:14-CV-5

**DEFENDANTS' PARTIAL**  
**MOTION TO DISMISS**

Defendants, First Data Resources, LLC, and First Data Corporation (collectively “Defendants”), pursuant to Federal Rule of Civil Procedure 12(b)(6), move this Court to dismiss Plaintiff’s first, second, third, and fourth causes of action in the Second Amended Complaint, filed by Plaintiff, Vickie Adams f/k/a Vickie Douglas (“Plaintiff”) with prejudice for the reason that these causes of action fail to state a claim upon which relief can be granted as more fully explained in Defendants’ Brief in Support of its Partial Motion to Dismiss, filed contemporaneously herewith.

WHEREFORE, Defendants respectfully request that this Court enter an Order pursuant to Federal Rule of Civil Procedure 12(b)(6) dismissing Plaintiff’s first, second, third, and fourth causes of action.

Dated this 15th day of January 2014.

FIRST DATA RESOURCES, LLC, and  
FIRST DATA CORPORATION,  
Defendants

\_\_\_\_\_/s/ Ruth A. Horvatich  
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ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

The undersigned hereby certified that on the 15th day of January 2014, the above and foregoing **Defendant's Partial Motion to Dismiss** was filed electronically with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

Robert V. Broom  
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& YAMAMOTO  
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\_\_\_\_\_/s/ Ruth A. Horvatich  
Ruth A. Horvatich